

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CLAUDE BEAUREGARD,

Plaintiff,

v.

U.S. CONCRETE, INC., MICHAEL D.  
LUNDIN, SUSAN M. BALL, KURT M.  
CELLAR, RAJAN C. PENKAR,  
RONNIE PRUITT, THEODORE P.  
ROSSI, and COLIN M. SUTHERLAND,

Defendants.

Civil Action No. 1:21-cv-06489-PAC

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), plaintiff Claude Beauregard hereby voluntarily dismisses his claims in the above-captioned action (the "Action"). Defendants have filed neither an answer nor a motion for summary judgment in the Action.

Dated: August 31, 2021

Respectfully submitted,

By: /s/ Joshua M. Lifshitz

Joshua M. Lifshitz

Email: [jml@jlclasslaw.com](mailto:jml@jlclasslaw.com)

**LIFSHITZ LAW FIRM, P.C.**

1190 Broadway

Hewlett, New York 11557

Telephone: (516) 493-9780

Facsimile: (516) 280-7376

*Attorneys for Plaintiff*